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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SCL USA INC.,

Debtor.

Chapter 7

Case No. 18-11501 (SHL)

In re:

CAMBRIDGE ANALYTICA LLC,

Debtor.

Chapter 7

Case No. 18-11500 (SHL)

**JOINDER OF THE DEBTORS TO CHAPTER 7 TRUSTEE'S OBJECTION TO DATA
BREACH PLAINTIFF'S MOTION FOR ORDER GRANTING LIMITED RELIEF
FROM THE AUTOMATIC STAY TO ALLOW SERVICE OF A
DOCUMENT PRESERVATION SUBPOENA**

SCL USA, Inc. (the "**SCL Debtor**") and Cambridge Analytica LLC, a/k/a Cambridge Analytica Commercial LLC, a/k/a Cambridge Analytica Political LLC, a/k/a Anaxi Solutions Inc. (the "**Cambridge Debtor**", and together with the SCL Debtor, the "**Debtors**"), by and through their undersigned counsel, hereby submit this joinder ("**Joinder**") to *Chapter 7 Trustee's*

Objection to Data Breach Plaintiff's Motion for an Order Granting Limited Relief from the Automatic Stay to Allow Service of a Document Preservation Subpoena (the “**Trustee Objection**”),¹ and respectfully state follows²:

JOINDER

1. The Debtors have turned over all books, records and papers relating to the Debtors’ estates that were in the Debtors’ possession or control to the chapter 7 trustee appointed in each of the Debtors’ chapter 7 cases (the “**Trustee**”). Accordingly, the relief requested in the Motion should be directed to the Trustee, who is in charge of the Debtors’ estates and all property of the estates, rather than the Debtors. Notwithstanding the foregoing, the Motion should be denied for the reasons set forth in the Trustee Objection.

2. The Debtors support and join in the objections and the relief requested in the Trustee Objection, including, without limitation, the Trustee’s assertion that the relief requested in the Motion is superfluous as it seeks to impose obligations on the Debtors that are already required by the Bankruptcy Code. Indeed, section 521(a)(3) of the Bankruptcy Code requires the Debtors to “cooperate the with the trustee as necessary to enable the trustee to perform the trustee’s duties under [the Bankruptcy Code],” and section 521(a)(4) of the Bankruptcy Code require the Debtors to “surrender to the trustee all property of the estate and any recorded information, including books, documents, records, and papers, relating to property of the estate . . . ” 11 U.S.C. § 521(a)(3) & (a)(4). The Debtors have complied, and will continue to comply, with their obligations under these and the other applicable provisions of the Bankruptcy Code, including turn-over any property of the Debtors’ estates that comes into the Debtors’ possession.

¹ All capitalized terms used herein and not otherwise defined herein shall have the meanings set forth in the Trustee Objection.

² The Debtors are not taking a position in this Joinder (and fully reserve all rights) as to the factual assertions contained in the Motion, all or a portion of which may be the subject of pending litigation.

RESERVATION OF RIGHTS

3. Nothing contained herein shall constitute a waiver of any rights or remedies of the Debtors under the Bankruptcy Code or applicable law, including without limitation, the rights to (i) amend, modify, and supplement this Joinder, or (ii) raise any other additional arguments at a later date.

CONCLUSION

4. The Debtors respectfully request that the Court (a) deny the Motion and (b) grant such other and further relief as the Court deems just and proper.

Dated: August 15, 2018
New York, NY

SCHULTE ROTH & ZABEL LLP

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